

Federal Defenders OF NEW YORK, INC.

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief

BY ECF

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Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

January 17, 2022

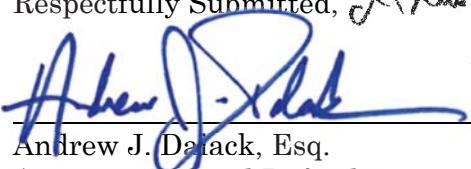
Honorable Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Andrew Joyner,
20 Cr. 505 (AJN)

Dear Judge Nathan:

I write to provide the Court with a status update regarding a pre-trial resolution in the above-captioned case. The parties are nearly finished finalizing the terms of a written plea agreement and request leave to provide the Court with the anticipated agreement and a proposed date for a change-of-plea conference on or SO before February 18, 2022. The Government consents to this application. Because ORDERED this additional period of delay is necessary to finalize a resolution to ongoing plea negotiations, the parties respectfully request that the Court exclude this time from Speedy Trial Act calculations under 18 U.S.C. § 3161(h)(7)(A).

Respectfully Submitted,


Andrew J. Daack, Esq.
Assistant Federal Defender

1/18/2022

Cc: AUSA Andrew Rohrbach
Counsel for the Government

Counsel for Andrew Joyner